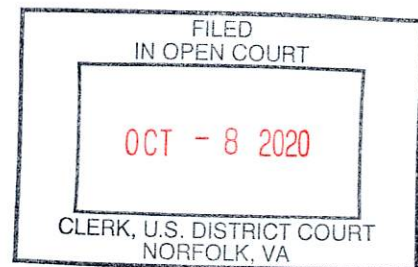


IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Norfolk Division



UNITED STATES OF AMERICA

v.

LAMONT GODFREY,
(Counts 1-20)

EUGENE JOHNSON,
(Counts 1, 3, 6, 12-14)

SHUNMANIQUE WILLIS,
(Counts 1, 4, 7, 15-17)

and

ALONZO WILLIAMS,
(Counts 1, 5, 8, 18-20)

Defendants.

UNDER SEAL

CRIMINAL NO. 2:20cr **95**

18 U.S.C. § 1349
Conspiracy to Commit Wire and Mail
Fraud
(Count 1)

18 U.S.C. §§ 1341 and 2
Mail Fraud
(Counts 2-5)

18 U.S.C. §§ 1343
Wire Fraud
(Counts 6-8)

18 U.S.C. §§ 1028A and 2
Aggravated Identity Theft
(Counts 9-20)

18 U.S.C. §§ 981(a)(1)(C)
Criminal Forfeiture

INDICTMENT

October 2020 TERM - At Norfolk, Virginia

THE GRAND JURY CHARGES THAT:

GENERAL ALLEGATION

1. The United States Coast Guard (Coast Guard) is the nation's lead federal agency charged with the superintendence of the U.S. Merchant Marine and steward for associated International Conventions. In executing these responsibilities, the Coast Guard prescribes regulations and develops policy to ensure that maritime vessels are safely manned with qualified

and competent mariners.

2. In 1978, the International Convention of Standards of Training, Certification and Watchkeeping for Seafarers (STCW) was adopted by an original group of 25 seafaring nations. Prior to 1978, standards for training and qualification of merchant seafarers were put in place by each individual nation with a merchant marine fleet. In 2012, changes to the STCW known as the “Manila Amendments” came into force to incorporate recent advances in maritime technology, and to add security training to counter the increased threat of hi-jacking and piracy. As of today, 164 nations have ratified the STCW.

3. Title 46, Code of Federal Regulations, Part 10 is designed to closely conform to the provisions of the STCW Convention, and forms the basis for merchant mariner training and qualifications in the United States. The STCW requires mariners to demonstrate practical proficiency and knowledge prior to the issuance of documents and licenses by the Coast Guard. This ensures that the maritime industry meets its obligations to employ well trained, competent mariners under clearly defined and understood procedures to safely operate vessels.

4. In accordance with the established STCW International Convention, the Merchant Mariner Credential (MMC) is now the standard document issued to merchant mariner crewmembers on all U.S flagged vessels operating with a licensed Master (Captain), or vessels over 100 gross tons. The MMC resembles a passport, and contains the full professional qualification information for the merchant mariner.

5. Title 46 C.F.R. Chapter I, Subchapter B, Part 10 governs the administration of the MMC program by the Coast Guard. The MMC regulations provide a means of determining and verifying the qualifications an MMC applicant must possess to be eligible to serve on merchant

vessels. It also provides a means of determining whether the applicant is a “safe and suitable person” to hold an MMC, and confirming that the applicant does not pose a threat to national security via the requirement to also hold a Transportation Worker Identification Credential (TWIC), issued by the Transportation Security Administration (TSA). The combination of the MMC and the TWIC documents ensure full vetting and biometric identification for merchant mariners operating in security-sensitive areas in the nation’s ports.

6. In the U.S., the merchant mariner training and education system consists of different levels of institutions. These tiers include full state sponsored maritime school programs such as the SUNY Maritime College, New York, New York; and the MIT Center for Ocean Engineering, Cambridge, Massachusetts, private merchant mariner training schools, such as the Mid-Atlantic Maritime Academy (MMA), Norfolk, Virginia; and the Chesapeake Maritime Training Institute (CMTI), Hayes, Virginia, and individual merchant mariner courses offered at schools such as Tidewater Community College at various campus locations in the area.

7. The Coast Guard has sole authority to grant approval to merchant marine training schools desiring to teach STCW qualified courses, and established the Coast Guard National Maritime Center (NMC) in Martinsburg, West Virginia, to manage and administer the STCW training and qualification system. The STCW course approval process is governed by 46 C.F.R. § 10.401 – 10.412, and ensures that the course covers the material necessary to satisfy regulatory training requirements.

8. Title 46, C.F.R. §§ 10.402 and 10.407 govern the approval of merchant mariner training courses and programs. The first step in a maritime school obtaining a qualified license to teach an STCW course is the submission of a proposed course curriculum package submitted to

the NMC for review and approval.

9. The NMC maintains a database of all approved courses in the United States on its website, <http://www.uscg.mil/nmc>. In order to get credit for a completed course, a mariner is required to report the course to the NMC. This can be done via mail by the individual mariner, or through an electronic submission process by the school. Course certificates for completed merchant mariner training classes can be submitted to the NMC database electronically via the "Homeport" web-based portal. "Homeport" is a NMC controlled system, with its server located in Martinsburg, West Virginia, which merchant mariner training schools can utilize to upload student information, using a Coast Guard issued user account and log-in that only school staff have access to.

10. The Mid-Atlantic Maritime Academy (MMA) is located in Norfolk, Virginia. As noted above, MMA is a private state-of-the-art maritime training center, offering mariners over 100 US Coast Guard approved deck and engineering courses. At all times relevant to the indictment, defendant LAMONT GODFREY was employed by MMA as the school's Chief Administrator. In this role GODFREY created and printed MMS training certificates and had access to the school's certifying stamp and official seals.

COUNT ONE

Beginning in or about July 2016 and continuing through in or about December 2019, the exact dates being unknown, in the Eastern District of Virginia and elsewhere, defendants LAMONT GODFREY, EUGENE JOHNSON, SHUNMANIQUE WILLIS, and ALONZO WILLIAMS, and other co-conspirators both known and unknown to the Grand Jury, knowingly and unlawfully combined, conspired, confederated and agreed together and with each other to

commit the following offenses, that is:

- (1) to devise and intend to devise a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and in execution of such scheme and artifice, to place and cause to be placed in any Post Office and authorized depository for mail matter, any matter and thing whatever, to be sent and delivered by the Postal Service and private and commercial interstate carrier, in violation of Title 18, United States Code, Section 1341; and
- (2) to devise and intend to devise a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and in execution of such scheme and artifice, to transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds transmitted for the purpose of executing such scheme and artifice to defraud, in violation of Title 18, United States Code, Section 1343.

WAYS, MANNER, AND MEANS

The ways, manner, and means by which the conspiracy was carried out included, but were not limited to, the following:

1. The purpose of the conspiracy was for defendants LAMONT GODFREY, EUGENE JOHNSON, SHUNMANIQUE WILLIS, and ALONZO WILLIAMS, and other co-conspirators both known and unknown to the Grand Jury, to fraudulently create counterfeit course certificates from the Mid-Atlantic Maritime Academy (MMA) and sell them directly to

individual mariners seeking various merchant mariner seafarer qualifications.

2. It was a part of the conspiracy that GODFREY, in his role as the Chief Administrator at MMA, used his position to fraudulently create false and counterfeit MMA course certificates and sell them to individual merchant mariners who had not otherwise taken the course at MMA or elsewhere and therefore were not entitled to receive the various qualifications.

3. It was further a part of the conspiracy that JOHNSON, WILLIS, and WILLIAMS, acted as brokers for GODFREY. In this roles, JOHNSON, WILLIS, and WILLIAMS, identified merchant mariners interested in purchasing the counterfeit course certificates created by GODFREY in exchange for a portion of the proceeds paid by the mariner to obtain the counterfeit certificates.

4. It was further a part of the conspiracy to defraud that GODFREY, JOHNSON, WILLIS, and WILLIAMS, and other co-conspirators both known and unknown to the Grand Jury, communicated details of the scheme and artifice to defraud via phone calls, text messages, and email communications between GODFREY located in the Eastern District of Virginia, and the other co-conspirators who were located outside of the Eastern District Virginia and in various other jurisdictions located across the United States.

5. It was further a part of the conspiracy to defraud that GODFREY, JOHNSON, WILLIS, and WILLIAMS, and other co-conspirators both known and unknown to the Grand Jury, sent funds to one another via various wire funds transfers, such as Western Union, Wal-Mart to Wal-Mart, Paypal, Venmo, and CashApp, between the Eastern District of Virginia and various other jurisdictions located across the United States..

6. It was further a part of the conspiracy to defraud that GODFREY, JOHNSON, WILLIS, and WILLIAMS, and other co-conspirators both known and unknown to the Grand Jury, would send the counterfeit course certificates created by GODFREY, to the individual mariners using the United States Postal Service, Federal Express (FedEx), and the United Parcel Service (UPS), a private commercial interstate carrier. Once the mariners received the counterfeit course certificates, they could then either scan the certificates and send them to the NMC via e-mail, or they could take them to their local U.S. Coast Guard Regional Exam Center (REC) who would scan the fraudulent course certificates and enter them in the NMC's system.

7. It was further a part of the conspiracy to defraud that GODFREY, JOHNSON, WILLIS, and WILLIAMS, and other co-conspirators both known and unknown to the Grand Jury, charged the individual mariners between several hundred dollars at the low end, to several thousand dollars at the high end, for each counterfeit course certificate.

8. It was further a part of the conspiracy to defraud that GODFREY, JOHNSON, WILLIS, and WILLIAMS, and other co-conspirators both known and unknown to the Grand Jury, created and sold counterfeit course certificates from the MMA to at least 150 individual mariners. As a result, the conspiracy profited from the sale of counterfeit course certificates in the hundreds of thousands of dollars.

ACTS IN FURTHERANCE OF THE CONSPIRACY

In furtherance of the conspiracy and to accomplish its objects, the co-conspirators and others known and unknown to the Grand Jury committed and caused to be committed the following acts, among others, in the Eastern District of Virginia and elsewhere:

LAMONT GODFREY

1. On various dates during the life of the conspiracy, various mariners who had learned of the conspiracy communicated with LAMONT GODFREY via various methods, such as telephone conversations, text messages, and email, between the Eastern District of Virginia and elsewhere, for the purpose of obtaining counterfeit MMA course certificates.

2. On various dates during the life of the conspiracy, LAMONT GODFREY found mariners to purchase counterfeit MMA course certificates from GODFREY. GODFREY used the names of these mariners to create counterfeit MMA course certificates.

3. On various dates during the life of the conspiracy, GODFREY instructed mariners to provide him the dates they were underway so he could prepare the counterfeit MMA course certificates. GODFREY also instructed mariners to wire him money via Western Union, Wal-Mart, PayPal, CashApp and MoneyGram, or directly provide him cash, to pay for the counterfeit course certificates.

4. On various dates during the life of the conspiracy, GODFREY sent digital images of the counterfeit MMA course certificates to the various mariners via text and email. GODFREY also placed the counterfeit MMS course certificates, along with instructions on how to enter them into the NMC database, in either the United States Postal Service or UPS for delivery to the various mariners and sent tracking information to the so the various mariners to track the certificates' delivery.

5. Sometime in or about March 2018, the exact dates being unknown, GODFREY communicated with M.S. via text, email and telephone, produced counterfeit MMA course certificates for M.S.'s wife, D.S., and sent them to M.S. via UPS in exchange for a \$700 payment

through Western Union.

6. Sometime in or about April 2017, the exact dates being unknown, GODFREY communicated with M.T. via text, email and telephone, produced counterfeit MMA course certificates for M.T., and sent them to M.T. via United States Postal Service and UPS in exchange for \$200 payment through PayPal.

7. Sometime in or about March 2017, the exact dates being unknown, GODFREY communicated with J.H. via text, email and telephone, produced counterfeit MMA course certificates for J.H., and sent them to J.H. via United States Postal Service and UPS in exchange for at least \$800 payment through PayPal and CashApp.

EUGENE JOHNSON

8. On various dates during the life of the conspiracy, various mariners who had learned of the conspiracy communicated with EUGENE JOHNSON via various methods, such as telephone conversations, text messages, and email, between the Eastern District of Virginia and elsewhere, for the purpose of obtaining counterfeit MMA course certificates.

9. On various dates during the life of the conspiracy, EUGENE JOHNSON acted as a broker for LAMONT GODFREY and found mariners to purchase counterfeit MMA course certificates from GODFREY in exchange for a portion of the proceeds.

10. On various dates during the life of the conspiracy, JOHNSON instructed mariners to provide him the dates they were underway so he could provide them to GODFREY for preparation of the counterfeit MMA course certificates. JOHNSON also instructed mariners to wire him money via Western Union, Wal-Mart, PayPal, CashApp and MoneyGram, or directly provide him cash, to pay for the counterfeit course certificates.

11. On various dates during the life of the conspiracy, JOHNSON sent digital images of the counterfeit MMA course certificates to the various mariners via text and email.

JOHNSON also sent tracking information to the various mariners for the various United States Postal Service and UPS mailers containing the counterfeit MMA course certificates.

12. Sometime between in or about August 2018 through October 2018, the exact dates being unknown, JOHNSON communicated with mariner A.B. via text, email and telephone. JOHNSON coordinated with GODFREY for GODFREY to produce counterfeit MMA course certificates for A.B., and JOHNSON sent them to A.B. via United States Postal Service and UPS in exchange for at least a \$1,160 payment through Western Union.

13. Sometime between April 2018 and the fall of 2018, the exact dates being unknown, JOHNSON communicated with mariner J.M. via text, email and telephone. JOHNSON coordinated with GODFREY for GODFREY to produce counterfeit MMA course certificates for J.M., and JOHNSON sent them to J.M. via United States Postal Service, FedEx, and UPS in exchange for at least a \$3,220 payment through Western Union and cash.

14. Sometime in or about November 2017, the exact dates being unknown, JOHNSON communicated with mariner W.B. via text, email and telephone. JOHNSON coordinated with GODFREY for GODFREY to produce counterfeit MMA course certificates for W.B., and JOHNSON sent them to W.B. via United States Postal Service in exchange for at least a \$900 payment through Wal-Mart.

SHUNMANIQUE WILLIS

15. On various dates during the life of the conspiracy, various mariners who had learned of the conspiracy communicated with SHUNMANIQUE WILLIS via various methods,

such as telephone conversations, text messages, and email, between the Eastern District of Virginia and elsewhere, for the purpose of obtaining counterfeit MMA course certificates.

16. On various dates during the life of the conspiracy, WILLIS acted as a broker for LAMONT GODFREY and found mariners to purchase counterfeit MMA course certificates from GODFREY in exchange for a portion of the proceeds.

17. On various dates during the life of the conspiracy, WILLIS instructed mariners to provide him the dates they were underway so he could provide them to GODFREY for preparation of the counterfeit MMA course certificates. WILLIS also instructed mariners to wire him money via Western Union, Wal-Mart, PayPal, CashApp and MoneyGram, or directly provide him cash, to pay for the counterfeit course certificates.

18. On various dates during the life of the conspiracy, WILLIS sent digital images of the counterfeit MMA course certificates to the various mariners via text and email. WILLIS also sent tracking information to the various mariners for the various United States Postal Service and UPS mailers containing the counterfeit MMA course certificates.

19. Sometime between in or about July and August 2018, the exact dates being unknown, WILLIS communicated with mariner C.H. via text, email and telephone. WILLIS coordinated with GODFREY for GODFREY to produce counterfeit MMA course certificates for C.H., and WILLIS sent them to C.H. via United States Postal Service in exchange for at least a \$2,900 payment through PayPal and CashApp.

20. Sometime between in or about December 2018, the exact dates being unknown, WILLIS communicated with mariner J.J. via text, email and telephone. WILLIS coordinated with GODFREY for GODFREY to produce counterfeit MMA course certificates for J.J., and

WILLIS sent them to J.J. via United States Postal Service and UPS in exchange for at least a \$800 payment through CashApp.

21. Sometime between in or about December 2018, the exact dates being unknown, WILLIS communicated with mariner J.P. via text, email and telephone. WILLIS coordinated with GODFREY for GODFREY to produce counterfeit MMA course certificates for J.P., and WILLIS sent them to J.P. via United States Postal Service and UPS in exchange for at least a \$500 payment through CashApp.

ALONZO WILLIAMS

22. On various dates during the life of the conspiracy, various mariners who had learned of the conspiracy communicated with ALONZO WILLIAMS via various methods, such as telephone conversations, text messages, and email, between the Eastern District of Virginia and elsewhere, for the purpose of obtaining counterfeit MMA course certificates.

23. On various dates during the life of the conspiracy, WILLIAMS acted as a broker for LAMONT GODFREY and found mariners to purchase counterfeit MMA course certificates from GODFREY in exchange for a portion of the proceeds.

24. On various dates during the life of the conspiracy, WILLIAMS instructed mariners to provide him the dates they were underway so he could provide them to GODFREY for preparation of the counterfeit MMA course certificates. WILLIAMS also instructed mariners to wire him money via Western Union, Wal-Mart, PayPal, CashApp and MoneyGram, or directly provide him cash, to pay for the counterfeit course certificates.

25. On various dates during the life of the conspiracy, WILLIAMS sent digital images of the counterfeit MMA course certificates to the various mariners via text and email.

WILLIAMS also sent tracking information to the various mariners for the various United States Postal Service and UPS mailers containing the counterfeit MMA course certificates.

26. Sometime between in or about March 2019, the exact dates being unknown, WILLIAMS communicated with mariner E.M. via text, email and telephone. WILLIAMS coordinated with GODFREY for GODFREY to produce counterfeit MMA course certificates for E.M., and WILLIAMS sent them to E.M. via United States Postal Service and UPS in exchange for at least a \$1,250 payment through PayPal.

27. Sometime between April 2018 and the fall of 2018, the exact dates being unknown, JOHNSON and WILLIAMS communicated with mariner J.M. via text, email and telephone. JOHNSON and WILLIAMS coordinated with GODFREY for GODFREY to produce counterfeit MMA course certificates for J.M., and JOHNSON and WILLIAMS sent them to J.M. via United States Postal Service and UPS in exchange for at least a \$3,220 payment through Western Union and cash.

28. Sometime between in or about December 2018 and May 2019, the exact dates being unknown, WILLIAMS communicated with mariner L.M. via text, email and telephone. WILLIAMS coordinated with GODFREY for GODFREY to produce counterfeit MMA course certificates for L.M., and WILLIAMS sent them to L.M. via United States Postal Service and UPS in exchange for at least a \$1,300 payment through PayPal.

(In violation of Title 18, United States Code, Section 1349.)

COUNTS TWO THROUGH FIVE

1. Beginning in or about July 2016 and continuing through in or about December 2019, the exact dates being unknown, in the Eastern District of Virginia and elsewhere, the

defendants LAMONT GODFREY, EUGENE JOHNSON, SHUNMANIQUE WILLIS, and ALONZO WILLIAMS, and other co-conspirators both known and unknown to the Grand Jury, did devise and intend to devise a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and in execution of such scheme and artifice, to place and cause to be placed in any Post Office and authorized depository for mail matter, any matter and thing whatever, to be sent and delivered by the Postal Service and private and commercial interstate carrier, which scheme and artifice, and the execution thereof, operated in substance as follows:

THE SCHEME AND ARTIFICE

2. Paragraphs 1-8 of the Ways. Manner, and Means Section of Count One are realleged and incorporated herein by reference, as if fully stated herein.

MAILINGS IN EXECUTION OF THE SCHEME AND ARTIFICE

3. Paragraphs 1-28 of the Acts in Furtherance of the Conspiracy Section of Count One are realleged and incorporated herein by reference, as if fully stated herein.

4. On or about the dates listed in the table below, for the purpose of executing the aforementioned scheme and artifice and attempting to do so, LAMONT GODFREY, EUGENE JOHNSON, SHUNMANIQUE WILLIS, and ALONZO WILLIAMS, did place and cause to be placed in any Post Office and authorized depository for mail matter, any matter and thing whatever, to be sent and delivered by the Postal Service and private and commercial interstate carrier according to the direction thereon the following matters:

COUNT	DATE OF MAILING	TYPE AND SUMMARY OF MAILING
2	March 26, 2018	LAMONT GODFREY sent and caused to be sent a United Parcel Service (UPS) envelope containing a number of counterfeit MMA course certificates to mariner D.S.
3	November 3, 2017	LAMONT GODFREY and EUGENE JOHNSON sent and caused to be sent a United States Postal Service mailer containing a number of counterfeit MMA course certificates to mariner W.B.
4	January 20, 2018	LAMONT GODFREY and ALONZO WILLIAMS sent and caused to be sent a United Parcel Service (UPS) mailer containing a number of counterfeit MMA course certificates to ALONZO WILLIAMS.
5	July 26, 2018	LAMONT GODFREY and SHUNMANIQUE WILLIS sent and caused to be sent a United Parcel Service (UPS) mailer containing a number of counterfeit MMA course certificates to SHUNMANIQUE WILLIS.

(In violation of Title 18, United States Code, Sections 1341 and 2.)

COUNTS SIX THROUGH EIGHT

Beginning in or about July 2016 and continuing through in or about December 2019, the exact dates being unknown, in the Eastern District of Virginia and elsewhere, the defendants LAMONT GODFREY, EUGENE JOHNSON, SHUNMANIQUE WILLIS, and ALONZO WILLIAMS did knowingly and unlawfully devise and intend to devise a scheme and artifice to defraud, and for obtaining money and property by means of materially false and fraudulent pretenses, representations, and promises, and did transmit and cause to be transmitted by means of wire, radio, and television communication, in interstate and foreign commerce, any writings, signs, signals, pictures, and sounds for the execution of such scheme and artifice, which scheme and artifice, and the execution thereof, operated in substance as follows:

THE SCHEME AND ARTIFICE

2. Paragraphs 1-8 of the Ways, Manner, and Means Section of Count One are realleged and incorporated herein by reference, as if fully stated herein.

ELECTRONIC TRANSMISSIONS IN FURTHERANCE OF THE SCHEME AND ARTIFICE

3. Paragraphs 1-28 of the Acts in Furtherance of the Conspiracy Section of Count One are realleged and incorporated herein by reference, as if fully stated herein.

4. On or about the dates noted in the Counts set forth below, in the Eastern District of Virginia and elsewhere, for the purpose of executing the aforesaid scheme and artifice, the defendants LAMONT GODFREY, EUGENE JOHNSON, SHUNMANIQUE WILLIS, and ALONZO WILLIAMS did knowingly transmit and cause to be transmitted by means of wire and radio communication in interstate and foreign commerce certain writings, signs, signals, pictures, and sounds, that is the text messages noted below:

COUNT	DATE OF WIRE	TYPE AND SUMMARY OF WIRE
6	February 23, 2018	LAMONT GODFREY and EUGENE JOHNSON sent each other electronic communications regarding the creation and mailing of MMA counterfeit course certificates.
7	November 2, 2019	LAMONT GODFREY and SHUNMANIQUE WILLIS sent each other electronic communications regarding the creation and mailing of MMA counterfeit course certificates.
8	October 16-17, 2019	LAMONT GODFREY and ALONZO WILLIAMS sent each other electronic communications regarding the creation and mailing of MMA counterfeit course certificates.

(In violation of Title 18, United States Code, Sections 1341 and 2.)

COUNT NINE

In or about March 2018, the exact date being unknown, in the Eastern District of Virginia and elsewhere, the defendant LAMONT GODFREY did knowingly use and cause to be used, without lawful authority, a means of identification of another (that is, the name and other identifying information) during and in relation to a felony relating to any provision contained in Chapter 63, that is, defendant used and caused to be used a means of identification of D.S. during and relation to violations of 18 U.S.C. § 1349, conspiracy to commit bank fraud, 18 U.S.C. § 1341, mail fraud, and 18 U.S.C. § 1343, wire fraud.

(In violation of Title 18, United States Code, Section 1028A(a)(1) and 2.)

COUNT TEN

In or about April 2017, the exact date being unknown, in the Eastern District of Virginia and elsewhere, the defendant LAMONT GODFREY did knowingly use and cause to be used, without lawful authority, a means of identification of another (that is, the name and other identifying information) during and in relation to a felony relating to any provision contained in Chapter 63, that is, defendant used and caused to be used a means of identification of M.T. during and relation to violations of 18 U.S.C. § 1349, conspiracy to commit bank fraud, 18 U.S.C. § 1341, mail fraud, and 18 U.S.C. § 1343, wire fraud.

(In violation of Title 18, United States Code, Section 1028A(a)(1) and 2.)

COUNT ELEVEN

In or about March 2017, the exact date being unknown, in the Eastern District of Virginia and elsewhere, the defendant LAMONT GODFREY did knowingly use and cause to be used, without lawful authority, a means of identification of another (that is, the name and other

identifying information) during and in relation to a felony relating to any provision contained in Chapter 63, that is, defendant used and caused to be used a means of identification of J.H. during and relation to violations of 18 U.S.C. § 1349, conspiracy to commit bank fraud, 18 U.S.C. § 1341, mail fraud, and 18 U.S.C. § 1343, wire fraud.

(In violation of Title 18, United States Code, Section 1028A(a)(1) and 2.)

COUNT TWELVE

Sometime between in or about August 2018 through October 2018, the exact dates being unknown, in the Eastern District of Virginia and elsewhere, the defendants LAMONT GODFREY and EUGENE JOHNSON did knowingly use and cause to be used, without lawful authority, a means of identification of another (that is, the name and other identifying information) during and in relation to a felony relating to any provision contained in Chapter 63, that is, defendant used and caused to be used a means of identification of A.B. during and relation to violations of 18 U.S.C. § 1349, conspiracy to commit bank fraud, 18 U.S.C. § 1341, mail fraud, and 18 U.S.C. § 1343, wire fraud.

(In violation of Title 18, United States Code, Section 1028A(a)(1) and 2.)

COUNT THIRTEEN

Sometime between April 2018 and the fall of 2018, the exact dates being unknown, in the Eastern District of Virginia and elsewhere, the defendants LAMONT GODFREY and EUGENE JOHNSON did knowingly use and cause to be used, without lawful authority, a means of identification of another (that is, the name and other identifying information) during and in relation to a felony relating to any provision contained in Chapter 63, that is, defendant used and caused to be used a means of identification of J.M. during and relation to violations of 18 U.S.C.

§ 1349, conspiracy to commit bank fraud, 18 U.S.C. § 1341, mail fraud, and 18 U.S.C. § 1343, wire fraud.

(In violation of Title 18, United States Code, Section 1028A(a)(1) and 2.)

COUNT FOURTEEN

In or about November 2017, the exact date being unknown, in the Eastern District of Virginia and elsewhere, the defendant s LAMONT GODFREY and EUGENE JOHNSON did knowingly use and cause to be used, without lawful authority, a means of identification of another (that is, the name and other identifying information) during and in relation to a felony relating to any provision contained in Chapter 63, that is, defendant used and caused to be used a means of identification of W.B. during and relation to violations of 18 U.S.C. § 1349, conspiracy to commit bank fraud, 18 U.S.C. § 1341, mail fraud, and 18 U.S.C. § 1343, wire fraud.

(In violation of Title 18, United States Code, Section 1028A(a)(1) and 2.)

COUNT FIFTEEN

In or about July and August 2018, the exact date being unknown, in the Eastern District of Virginia and elsewhere, the defendants LAMONT GODFREY and SHUNMANIQUE WILLIS did knowingly use and cause to be used, without lawful authority, a means of identification of another (that is, the name and other identifying information) during and in relation to a felony relating to any provision contained in Chapter 63, that is, defendant used and caused to be used a means of identification of C.H. during and relation to violations of 18 U.S.C. § 1349, conspiracy to commit bank fraud, 18 U.S.C. § 1341, mail fraud, and 18 U.S.C. § 1343, wire fraud.

(In violation of Title 18, United States Code, Section 1028A(a)(1) and 2.)

COUNT SIXTEEN

In or about December 2018, the exact date being known, in the Eastern District of Virginia and elsewhere, the defendants LAMONT GODFREY and SHUNMANIQUE WILLIS did knowingly use and cause to be used, without lawful authority, a means of identification of another (that is, the name and other identifying information) during and in relation to a felony relating to any provision contained in Chapter 63, that is, defendant used and caused to be used a means of identification of J.J. during and relation to violations of 18 U.S.C. § 1349, conspiracy to commit bank fraud, 18 U.S.C. § 1341, mail fraud, and 18 U.S.C. § 1343, wire fraud.

(In violation of Title 18, United States Code, Section 1028A(a)(1) and 2.)

COUNT SEVENTEEN

In or about December 2018, in the Eastern District of Virginia and elsewhere, the defendants LAMONT GODFREY and SHUNMANIQUE WILLIS did knowingly use and cause to be used, without lawful authority, a means of identification of another (that is, the name and other identifying information) during and in relation to a felony relating to any provision contained in Chapter 63, that is, defendant used and caused to be used a means of identification of J.P. during and relation to violations of 18 U.S.C. § 1349, conspiracy to commit bank fraud, 18 U.S.C. § 1341, mail fraud, and 18 U.S.C. § 1343, wire fraud.

(In violation of Title 18, United States Code, Section 1028A(a)(1) and 2.)

COUNT EIGHTEEN

In or about March 2019, the exact date being unknown, in the Eastern District of Virginia and elsewhere, the defendants LAMONT GODFREY and ALONZO WILLIAMS did knowingly use and cause to be used, without lawful authority, a means of identification of another (that is,

the name and other identifying information) during and in relation to a felony relating to any provision contained in Chapter 63, that is, defendant used and caused to be used a means of identification of E.M. during and relation to violations of 18 U.S.C. § 1349, conspiracy to commit bank fraud, 18 U.S.C. § 1341, mail fraud, and 18 U.S.C. § 1343, wire fraud.

(In violation of Title 18, United States Code, Section 1028A(a)(1) and 2.)

COUNT NINETEEN

Sometime between April 2018 and the fall of 2018, the exact date being unknown, in the Eastern District of Virginia and elsewhere, the defendants LAMONT GODFREY and ALONZO WILLIAMS did knowingly use and cause to be used, without lawful authority, a means of identification of another (that is, the name and other identifying information) during and in relation to a felony relating to any provision contained in Chapter 63, that is, defendant used and caused to be used a means of identification of J.M. during and relation to violations of 18 U.S.C. § 1349, conspiracy to commit bank fraud, 18 U.S.C. § 1341, mail fraud, and 18 U.S.C. § 1343, wire fraud.

(In violation of Title 18, United States Code, Section 1028A(a)(1) and 2.)

COUNT TWENTY

Sometime between in or about December 2018, and April 2019, the exact date being unknown, in the Eastern District of Virginia and elsewhere, the defendants LAMONT GODFREY and ALONZO WILLIAMS did knowingly use and cause to be used, without lawful authority, a means of identification of another (that is, the name and other identifying information) during and in relation to a felony relating to any provision contained in Chapter 63, that is, defendant used and caused to be used a means of identification of L.M. during and

relation to violations of 18 U.S.C. § 1349, conspiracy to commit bank fraud, 18 U.S.C. § 1341, mail fraud, and 18 U.S.C. § 1343, wire fraud.

(In violation of Title 18, United States Code, Section 1028A(a)(1) and 2.)

FORFEITURE

THE GRAND JURY FURTHER FINDS PROBABLE CAUSE THAT:

1. The defendants, if convicted of any of the violations alleged in Counts One through Eight of this indictment, shall forfeit to the United States, as part of the sentencing pursuant to Federal Rule of Criminal Procedure 32.2, any property, real or personal, which constitutes or is derived from proceeds traceable to the violation.
2. If any property that is subject to forfeiture above is not available, it is the intention of the United States to seek an order forfeiting substitute assets pursuant to Title 21, United States Code, Section 853(p) and Federal Rule of Criminal Procedure 32.2(e).

(In accordance with Title 18, United States Code, Section 981(a)(1)(c) and Title 28, United States Code, Section 2461(c).)

United States v. Lamont Godfrey, et. al.
Criminal No. 2:20cr **95**

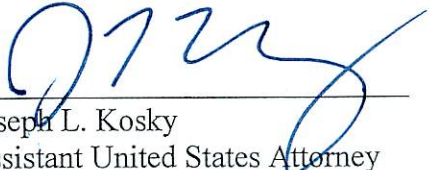
A TRUE BILL:

REDACTED COPY

FOREPERSON

G. ZACHARY TERWILLIGER
UNITED STATES ATTORNEY

By:



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